

**UNITED STATES DISTRICT COURT DISTRICT OF
DELAWARE**

ROBERT E. BROWN and,)	
SHIRLEY H. BROWN, h/w,)	C. A. 04-617 SLR
Plaintiffs,)	
v.)	
)	JURY DEMANDED
INTERBAY FUNDING, LLC, and)	
LEGRECA & QUINN REAL ESTATE)	
SERVICES INC.,)	
)	
Defendants.)	

**RESPONSE OF LEGRECA AND QUINN REAL ESTATE SERVICES INC. TO
PLAINTIFFS REQUEST FOR PRODUCTION OF DOCUMENTS OF PROFILES
OF APPLICANTS (ROBERT E. AND SHIRLEY H. BROWN) DEVELOPED BY
INTERBAY FUNDING, LLC**

Comes now, Robert E. And Shirley H. Brown, and request production of all documents and other materials used to develop the profiles of Robert E. And Shirley H. Brown and the subject properties, referred to by Legreca and Quinns letter of "Re: Complete Appraisal of Real Estate Property in a Summary Report of 2617 - 2625 Market Street, City of Wilmington, New Castle County, Delaware 19802" of March 30, 2004 and why the applicants (Robert E. and Shirley H. Brown, the intended users) were profiled?

RESPONSE: Objection to the extent that this interrogatory mischaracterizes the Answering Defendant's letter which is part of the record and speaks for itself. Further objection to the extent that this interrogatory is not addressed to the proper party. Further objection in that this interrogatory is vague as to the meaning of the term "develop the profiles" and is not propounded in a timely manner in accordance with the Order of this Court. Without waiving these objections, by way of

further answer, to the extent that this interrogatory is addressed to Defendant Lagreca & Quinn, no such documents exist and Answering Defendant had no information regarding the identity of the potential purchasers of this property at 2617 - 1625 Market Street, Wilmington, Delaware at the time the appraisal of such property was made.

REGER & RIZZO, LLP
As to objections only

/s/ Carol J. Antoff

Carol J. Antoff, Esquire
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(302) 652-3611
Attorney for Defendant Legreca & Quinn

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LEGRECA & QUINN REAL ESTATE)
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CERTIFICATE OF SERVICE

I, the undersigned, do hereby certify on this 17th day of March 2005 that two true and correct copies of the Response of Legreca and Quinn Real Estate Services Inc. to Plaintiffs Request for Production of Documents of Profiles of Applicants (Robert E. and Shirley H. Brown) Developed by Interbay Funding, LLC have been served electronically upon the following:

Robert E. Brown and
Shirley H. Brown
1024 Walnut Street
Wilmington, DE 19801

Sandra L. Brickel, Esquire
David M. Souders, Esquire
Weiner Brodsky Sidman Kidder, P.C.
1300 19th Street, N.W. 5th Floor
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David L. Finger, Esquire
One Commerce Center
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